

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

JEFFREY MARTIN FELDMILLER and
SANDRA LEE FELDMILLER

Debtors.

RONDA J. WINNECOUR, CHAPTER 13
TRUSTEE Movant

v.

NEWREZ, LLC D/B/A SHELLPOINT
MORTGAGE SERVICING,

Respondent

Lead Bankr. Case No. 15-11089-TPA

Chapter 13

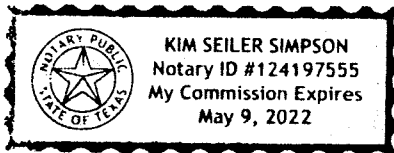
AFFIDAVIT

Before me, the undersigned authority, personally appeared Paul Cervenka who, being duly sworn according to law, deposes and says that:

1. I am the Bankruptcy Managing Attorney of Bonial & Associates, P.C. (BPC), who handles notice of final cure responses for NewRez, LLC d/b/a Shellpoint Mortgage Servicing, Respondent herein, and I am duly authorized to make this Affidavit.
2. I make this Affidavit because in the ordinary course of my duties I work in conjunction with NewRez, LLC d/b/a Shellpoint Mortgage Servicing on bankruptcy matters.
3. BPC is retained by NewRez to respond to its notices of final cure. NewRez provides direct information as to each account and BPC prepares and files the responses.
4. BPC has reviewed its existing process with NewRez and has enhanced the quality control layer on trustee post-petition payments to require additional management account reconciliation on disagree responses to final cure.

5. BPC understands that further investigation and due diligence is required prior to filing a response of disagree to notices of final cure, specifically, reconciliation with trustee ledgers, previous payment change notices and orders, and if necessary, reaching out to the Chapter 13 Trustee's office prior to filing a disagree response, and also if necessary, discussion with local Pennsylvania counsel. This has also been discussed and explained to NewRez.
6. BPC asserts that these measures should prevent this type of disagree issue in the future.

Further Affiant sayeth not.



Paul Cervenka
(Affiant Signature)

Paul Cervenka
(Affiant Printed Name)

Sworn to and subscribed before me

this 8th day of January 2021

by Paul Cervenka

Kim Seiler Simpson
Notary Public